

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 RAQUEL LAZO
5 Assistant Federal Public Defender
6 Nevada State Bar No. 8540
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 Raquel_Lazo@fd.org

11 Attorney for Jason Edward Roon

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Case No. 2:22-mj-00768-EJY

16 Plaintiff,

17 **STIPULATION TO CONTINUE**
18 **PRELIMINARY HEARING**
19 (Fifth Request)

20 v.

21 JASON EDWARD ROON,

22 Defendant.

23 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting
24 United States Attorney, and Lauren Ibanez, Assistant United States Attorney, counsel for the
25 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
26 Assistant Federal Public Defender, counsel for Jason Edward Roon, that the Preliminary
Hearing currently scheduled on March 19, 2025, at 4:00 p.m., be vacated and continued to a
date and time convenient to the Court, but no sooner than sixty (60) days.

27 This Stipulation is entered into for the following reasons:

28 1. Since returning from family leave, defense counsel has spoken to the
29 government. The parties are close to a potential pre-indictment resolution. Some details are still
30 being hashed out.

1 2. The defendant is in custody and agrees with the need for the continuance.
2 3. The parties agree to the continuance.
3 4. The additional time requested by this stipulation is excludable in computing the
4 time within which the defendant must be indicted and the trial herein must commence pursuant
5 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
6 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

7 This is the fifth request for a continuance of the preliminary hearing.

8 DATED this 7th day of March 2025.

9
10 RENE L. VALLADARES
11 Federal Public Defender

12 /s/ *Raquel Lazo*
13 By _____
14 RAQUEL LAZO
15 Assistant Federal Public Defender

16 SUE FAHAMI
17 Acting United States Attorney

18 /s/ *Lauren Ibanez*
19 By _____
20 LAUREN IBANEZ
21 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JASON EDWARD ROON,
Defendant.

Case No. 2:22-mj-00768-EJY

ORDER

JASON EDWARD ROON,
Defendant.

IT IS ORDERED that the Preliminary hearing currently scheduled for Wednesday, March 19, 2025, at 4:00 pm., be vacated and continued to May 21, 2025, at the hour of 4:00 p.m. in Courtroom 3D.

DATED this 10th day of March 2025.

Elayna J. Zouachah
UNITED STATES MAGISTRATE JUDGE